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Attorneys for Defendant and
 Counterclaimant SKYRYSE, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT
 ALIN PILKINGTON, MISOOK
 KIM, and DOES NOS.1-50,

Defendants.

Case No. 2:22-cv-09094-GW-MAR

**JOINT STIPULATION REGARDING
 BRIEFING AND HEARING
 SCHEDULE ON MOOG'S PENDING
 MOTION TO ENFORCE
 COMPLIANCE WITH MARCH 11,
 2022 TRO AND FOR SANCTIONS
 (DKT. 400)**

Complaint Filed: March 7, 2022
 Counterclaims Filed: January 30, 2023

1 IT IS HEREBY STIPULATED by and between Plaintiff and
2 Counterdefendant Moog Inc. (“Moog”) and Defendant and Counterclaimant
3 Skyryse, Inc. (“Skyryse”) (Moog and Skyryse are collectively referred to as the
4 “Parties”) through their respective attorneys of record, as follows:

5 WHEREAS, on March 16, 2023, Moog filed against Skyryse a Motion to
6 Enforce Compliance with the March 11, 2022 Stipulated TRO (Dkt. 25) and for
7 Monetary and Adverse Inference Sanctions for Contempt and Spoliation (the
8 “Motion to Enforce”), with the hearing originally noticed for April 13, 2023 (Dkts.
9 399, 400);

10 WHEREAS, on March 21, 2023, Skyryse filed an *Ex Parte* Application to
11 continue to hearing date on Moog’s Motion to Enforce from April 13, 2023 to May
12 15, 2023 (Dkt. 416), which was granted by the Court on March 23, 2023 (Dkt. 420);

13 WHEREAS, Skyryse’s assessment of Moog’s Motion to Enforce is that it
14 encompasses numerous discrete issues with significant bearing on this case,
15 incorporates by reference 82 pages of expert declarations, and refers to
16 approximately 4,000 pages of documentary exhibits, and Skyryse therefore believes
17 it requires at least 9,000 words to respond to Moog’s motion, and Moog believes it
18 requires at least 9,000 words to respond to Skyryse’s opposition;

19 WHEREAS, the Parties have met and conferred and agreed to a schedule and
20 parameters for limited depositions of any experts that submit declarations in support
21 of or in opposition to Moog’s Motion to Enforce;

22 WHEREAS, Moog’s two experts who submitted declarations in support of
23 the Motion to Enforce are scheduled to be deposed on April 17, 2023;

24 WHEREAS, Moog intends to depose any Skyryse expert who submits a
25 declaration in opposition to Moog’s Motion to Enforce on May 1 and 2, 2023,
26 although such Skyryse experts have not yet been disclosed;

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1 WHEREAS, Moog believes it requires at least two weeks from the filing of
2 Skyryse's Opposition to the Motion to Enforce to complete the limited expert
3 depositions and file its reply brief;

4 WHEREAS, the Parties have agreed that Skyryse's Opposition to the Motion
5 to Enforce is due on April 24, 2023 and that the word count for Skyryse's Opposition
6 will be expanded from 7,000 to 9,000 words, including headings, footnotes, and
7 quotations but excluding the caption, the table of contents, the table of authorities,
8 the signature block, the certification required by L.R. 11-6.2, and any indices and
9 exhibits;

10 WHEREAS, the Parties have also agreed that the hearing on Moog's Motion
11 to Enforce shall be continued from May 15, 2023 to May 22, 2023 (subject to the
12 Court's ability), making Moog's reply brief due on May 8, 2023 and that the word
13 count for Moog's Reply will be expanded from 7,000 to 9,000 words, including
14 headings, footnotes, and quotations but excluding the caption, the table of contents,
15 the table of authorities, the signature block, the certification required by L.R. 11-6.2,
16 and any indices and exhibits;

17 WHEREAS, Moog reserves the right to seek a further continuance of the
18 hearing on the Motion to Enforce if, after receiving Skyryse's Opposition and
19 opposing declarations, it believes additional time for depositions and filing its reply
20 brief is needed; and

21 WHEREAS, Skyryse also reserves the right to seek a further continuance of
22 the hearing, to seek further discovery, or to submit further briefing, if after deposing
23 Moog's experts or receiving Moog's Reply, it believes such relief is necessary.

24 NOW THEREFORE, subject to the Court's approval, the Parties stipulate
25 and agree that:

- 26 1. The word count for Skyryse's Opposition to the Motion to Enforce,
27 which is due on April 24, 2023, is expanded from 7,000 to 9,000 words,
28 including headings, footnotes, and quotations but excluding the

caption, the table of contents, the table of authorities, the signature block, the certification required by L.R. 11-6.2, and any indices and exhibits;

2. Moog's Reply in Support of its Motion to Enforce is due on May 8, 2023, and the word count for Moog's reply is expanded from 7,000 to 9,000 words, including headings, footnotes, and quotations but excluding the caption, the table of contents, the table of authorities, the signature block, the certification required by L.R. 11-6.2, and any indices and exhibits;
3. The hearing on Moog's Motion to Enforce shall be continued from May 15, 2023 to May 22, 2023 (subject to the Court's availability).

IT IS SO STIPULATED.

Dated: April 14, 2023

SHEPPARD, MULLIN, RICHTER & HAMPTON
LLP

By: /s/ Kazim A. Naqvi
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Counsel for Plaintiff and Counterdefendant
Moog Inc.

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By: /s/ Gabriel S. Gross
Gabriel S. Gross
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ATTESTATION

Pursuant to Civil Local Rule 5-4.3.4, I, Kazim A. Naqvi, attest that
concurrence in the filing of this document has been obtained by all its signatories.

Dated: April 14, 2023

/s/ Kazim A. Naqvi